

- 70 | Page 2-11, 2.3.4.1
If the trigger elevations are allowed to be revisited every 5 years, could they be made more liberal (to allow for additional surplus opportunity) or only more conservative? If more liberal, how will environmental compliance be accomplished for any additional impacts?
- 71 | Page 2-12, Figure 2-4
Which tier 3 would be implemented if this alternative is selected? The one in the DEIS or the original California one?
- 72 | Page 2-13, 2.3.4.2.4
How would Mexico receive surplus water under this alternative?
- 73 | Page 2-16, Table 2-1
In the 2nd paragraph under Lake Powell effects, should the 3838 figure be 3638?
- 74 | Throughout the table, the words "similar to" describe effects among alternatives. In a summary table this is acceptable, but the full text discussions should be more specific.
- Chapter 3: Affected Environment and Environmental Consequences
- 3.1: Introduction*
- 75 | Page 3.1-2, 3.1.3
As stated previously, the no action or baseline condition lacks probability, not predictability. The criteria that were used in 1998-2000 to determine surplus should remain the no action alternative and be the criteria post 2015.
- 3.2: Potentially Affected Area*
- 76 | Page 3.2-1, 3.2
The effects of providing for interim surplus water extend beyond the Colorado River corridor. This water will be used to facilitate land development and provide a hedge against future shortages that could influence how that development occurs. Most of these developments are not speculative. Even if there are no new developments that could be considered, the presence of this water will enable the continuation of existing development plans. This is an effect that needs additional discussion. The presence of completed Habitat Conservation Plans for some of the development areas should be mentioned, as should be the lack of such plans in other areas.
- 77 | Page 3.2-4, 3.2.1.4
This reach of the river is not included in many of the subsequent analyses and it should be so included. Please make sure the effects are discussed in the document.

70: The trigger elevations could move up or down. Appropriate environmental compliance would be performed.

71: If the California Alternative were selected, the tiers described in Chapter 2 of the FEIS would be implemented.

72: See response to Comment 57-69.

73: Yes. A correction has been made.

74: Comment noted.

75: The Secretary currently considers a number of factors consistent with the Long Range Operating Criteria to determine, on an annual basis, whether or not surplus conditions exist in the Lower Basin. This process (the No Action Alternative for the purpose of the Interim Surplus Criteria EIS) provides less certainty with regard to surplus determinations than the action alternatives under consideration. See FEIS Section 2.2.5 for information regarding the baseline used for analysis in the FEIS, as well as response to comment 11-9 and 57-5 for additional information.

76: Effects from the use of Colorado River water outside of the river corridor is beyond the scope of analysis necessary to determine the potential effects of interim surplus criteria. Also, see response to Comment 56-4.

77: See response to Comment 67-12.

3.3: River System Operations

- 78 | General Comments: The reservoir operations section is much clearer and more informative than the river reach sections. The latter should be reviewed and rewritten to provide for greater clarity and understanding for the reader.
- 79 | Page 3.3-4, 3.3.1.2
The discussion of storage space needed in Lake Mead for rainfall and snowmelt is not clear from this discussion. The percentage or actual space that has been made available in Mead over at least the time period covered by the current flood control operations criteria should be provided. A specific figure is given for Lake Powell in the preceding section. Since the normal space building releases are less than those needed for water users, how does Lake Mead empty the required space in accordance with the schedule? Since Lake Mead water levels are highest in December and January and lowest in July, how does this relate to the storage required in Table 3.3.2?
- 80 | Page 3.3-8, 3.3.3.2
paragraph 2: This is confusing as far as Mexico's flood surplus is concerned. Does the DEIS intend to say that regardless of the alternative under analysis, there has to be enough water in Lake Mead to trigger what would be the COE flood control requirements before Mexico would be able to get its 200,000 af? If that is the case, please explain how this could happen (would these years be part of the 90th percentile line, or somewhere else)?
- 81 | Page 3.3-9, 3.3.3.3
Assumptions Common: The first two assumptions reinforce the need to look at how Lake Mead storage is determined under the requirements in Table 3.3.2. If available storage in the Upper Basin affects storage available in Lake Mead, and increased depletions from those reservoirs increase the available storage, what storage is needed in Mead? Further, if changes could be made to these storage criteria (does BOR have discretion?), could these be used to reduce or eliminate adverse effects to reservoir levels and flood flows resulting from the proposed action? Should this be an alternative?
- 82 | The assumption of future Upper Basin depletions is questioned by the Service. At most, only some of these belong in the baseline and the rest are part of cumulative effects. No separate analysis for cumulative effects was run, and this should be clarified.
- 83 | Assumptions Specific: Why does the Flood Control alternative not include the implementation of the 4.4 Plan? If the actual purpose and need of developing the interim surplus criteria is to provide water to implement the 4.4 Plan, then the Flood Control alternative does not meet the need. Please explain why this decision was made.
- 84 cont'd below | Page 3.3-11, 3.3.3.5
paragraph 2: This is an extremely important paragraph and the concepts herein should be stressed earlier in the DEIS. The models are not predictive, nor are they probabilistic for actual
- 78: Additional explanation has been added to Section 3.3.4.5.
- 79: The US Army Corps of Engineers is responsible for developing the flood control operation plan for Hoover Dam and Lake Mead pursuant to 33 CFR 208.11. Please refer to these regulations for a more detailed description of the Corps flood control and space building operations. Specifically, space building releases can be as high as 29,000 cfs while releases to meet downstream demands are typically less than 20,000 cfs. Lake Mead is typically lower in the summer as increasing downstream demands are met. This should not be confused with the space requirement, which in effect sets an upper limit on the storage at Lake Mead.
- 80: Yes. This is the modeling assumption used for all alternatives and baseline. Flood control releases occur when the hydrologic inflow, combined with the storage in Lake Mead, results in releases (in excess of downstream demand) necessary to meet the flood control regulations. Flood control releases occur in approximately 35% of the traces in 2007 and in 22% in 2016, under baseline conditions (see Figure 3.16-1).
- 81: Reclamation does not have the authority to modify the system space requirements (Table 3.3.2). As described in Section 3.3.3.3 and Attachment J, a minimum space of 1.5 maf is required at Lake Mead for flood control.
- 82: See response to Comment No. 57-10.
- 83: In the FEIS, the Flood Control Alternative includes implementation of the California Colorado River Water Use Plan. See response to Comment No. 37-11 for additional discussion.
- 84: The referenced statement and paragraph is appropriately located under Section 3.3 - Modeling and Future Hydrology.